

REMARKS

This is in response to the Office Action mailed July 12, 2005. In the Office Action, Applicant's Claims 2-10, 13-15, 17, and 23-26 were rejected under 35 U.S.C. 101 and Applicant's Claims 27-29 were rejected as anticipated by Israni (U.S. Pat. No. 5,968,109). Applicant traverses these rejections. Reconsideration of the present application is respectfully requested.

Applicant's Claims 19 and 20 were not rejected in the Office Action so accordingly, Applicant presumes these claims are allowable. Therefore, this response will not address these two claims.

I. Applicant's Claims 2-10, 13-15, 17 and 23-26 comply with 35 U.S.C. 101.

In the Office Action, Applicant's Claims 2-10, 13-15, 17, 23-26 were rejected under 35 U.S.C. 101 as being non-statutory. According to the Office Action, the method claims did not claim a technological basis in the body of the claims. This rejection should be withdrawn because these claims unequivocally include technological bases and include structural and/or functional relationships that can be implemented by computer. Specifically, each of the claims recites a "*parcel*" or "*parcels*." A "*parcel*" defines a physical relationship formed of groupings of pluralities of separate data entities. Recitation of such "*parcels*" or groupings in each of the claims fulfills any requirement for a structural and/or functional relationship. Accordingly, Applicant's claims fully comply with 35 U.S.C. 101 and therefore the rejection of these claims for this reason should be withdrawn.

In the interest of advancing prosecution and allowance of the present application, Applicant has amended Claims 23-26. These amendments further clarify that the subject matter recited by the claims fully complies with 35 U.S.C. 101.¹

¹ Applicant regards the amendments of Claims 23-26 as clarifying limitations already explicitly or implicitly recited in the claims and accordingly does not consider the scope of the claims to be narrowed by these amendments.

II. Applicant's Claims 27-29 are not anticipated by Israni.

Applicant's Claims 27-29 were rejected as anticipated by Israni (U.S. Pat. No. 5,968,109). As noted by the Examiner, the present application and the Israni patent are assigned to a common assignee and several of the co-inventors of the present application were also co-inventors of the Israni patent.

The subject matter of the present application represents an improvement over the inventions disclosed in Israni.² Israni discloses forming a geographic database organized into "parcels" where each parcel includes those data entities that represent the geographic features located within a separate one of a plurality of rectangular geographic areas into which a region represented by the geographic database is divided. According to the parcelization method disclosed by Israni, a large area is divided into a plurality of small areas and then the data for each of the small areas is collected and stored together (i.e., forming a "parcel") on a data storage medium. As explained in Israni, parcelization of the data representing a geographic region can improve the performance of a computer-based system that uses the data.

Israni does not disclose any type of data structure, such as an index or bitmap, that allows for identifying particular data items *within* a parcel based on any particular criterion or attribute. Further, Israni does not disclose that the rectangular area associated with a parcel is divided any further. Because Israni does not disclose these features, Israni does not disclose the following limitation recited in Applicant's independent Claim 27:

"a plurality of indexes, each of which is associated with a separate respective one of said plurality of parcels, and wherein each index relates each of the data entities in the subset of data entities contained in the parcel associated therewith to at least one rectangular sub-area formed of the rectangular area associated with the parcel associated therewith."

² The Israni patent is assigned to the assignee of the present application. To the extent permitted by law, any statements in the present response regarding the disclosure of the Israni patent should not be used to restrict the scopes of claims in the Israni patent.

Because Israni does not disclose this limitation, Applicant's independent Claim 27 and dependent Claim 28 are not anticipated by Israni.

Applicant's independent Claim 29 is also not anticipated by Israni. With respect to Applicant's independent Claim 29, Israni fails to disclose the following limitations of the claim:

- (i) *"a plurality of first indexes, each of which is associated with a respective one of the plurality of parcels, wherein each first index defines a plurality of sub-areas formed of the area associated with the parcel associated therewith";*
- (ii) *"a plurality of second indexes, each of which is associated with a respective one of the plurality of parcels, wherein each second index associates each of the data records in the parcel associated therewith to at least one of the plurality of sub-areas defined by the first index associated with the parcel," and*
- (iii) *"the computer readable data structure means identifies which of the data records represent segments of roads located in any specified sub-area of any specified area."*

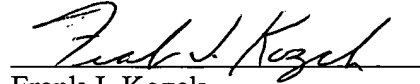
Because Israni fails to disclose any one of these limitations, Applicant's Claim 29 is not anticipated by Israni.

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Reply to Office Action of July 12, 2005

III. Conclusion

Applicant submits that the present application is in condition for allowance. If any issues remain, the Examiner is invited to call the undersigned.

Respectfully submitted,



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